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7	Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust				
8	2005-2	or increan from Morigage investment frust			
9	UNITED STATES DISTRICT COURT				
10	DISTRICT OF NEVADA				
11	DEUTSCHE BANK NATIONAL TRUST	Case No.: 2:20-cv-01885-APG-VCF			
12	COMPANY, FORMERLY KNOWN AS BANKERS TRUST COMPANY OF				
13	CALIFORNIA, N.A., AS TRUSTEE FOR	STIPULATION AND ORDER TO			
14	AMERICAN HOME MORTGAGE INVESTMENT TRUST 2005-2,	EXTEND TIME PERIOD TO RESPOND TO COMMONWEALTH LAND TITLE			
15		INSURANCE COMPANY'S			
16	Plaintiff, vs.	OPPOSITION TO COUNTERMOTION FOR PARTIAL SUMMARY			
17		JUDGMENT [ECF No. 36]			
	FIDELITY NATIONAL TITLE GROUP, INC.; FIDELITY NATIONAL TITLE	[Fifth Request]			
18	INSURANCE COMPANY;	[Firm Request]			
19	COMMONWEALTH LAND TITLE INSURANCE COMPANY; DOE				
20	INDIVIDUALS I through X; and ROE				
21	CORPORATIONS XI through XX, inclusive,				
22	Defendants.				
23		_			
24	Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust				
25	Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005-				
26	2 ("Deutsche Bank") and Defendant, Commonwealth Land Title Insurance Company				
27	("Commonwealth"), by and through their attorneys of record, hereby stipulate and agree as				
28	follows:				

1		1.	On September 23, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial
2			District Court, Case No. A-20-821781-C [ECF No. 1-1];
3		2.	On October 8, 2020, Commonwealth filed a Petition for Removal to this Court [ECF
4			No. 1];
5		3.	On October 13, 2020, Commonwealth filed a Motion to Dismiss [ECF No. 4];
6		4.	On November 30, 2020, Deutsche Bank filed an Opposition to Commonwealth's
7			Motion to Dismiss and Countermotion for Partial Summary Judgment [ECF Nos. 24
8			and 25];
9		5.	On December 21, 2020, Commonwealth filed its Reply in Support of its Motion to
10			Dismiss and Opposition to Countermotion for Partial Summary Judgment [ECF No.
11			36];
12		6.	Deutsche Bank contends that it is entitled to file a response to Commonwealth's
13			Opposition to its Countermotion for Partial Summary Judgment and that its deadline
14			to do so is March 1, 2021 [ECF No. 46];
15		7.	Deutsche Bank's counsel is requesting an extension until March 19, 2021 to respond
16			to Commonwealth's Opposition;
17		8.	This additional extension is requested to allow Deutsche Bank additional time to
18			finalize and file its response to the Opposition as lead handling counsel for Deutsche
19			Bank continues to recover from an unexpected medical emergency. The associate
20			counsel for Deutsche Bank has also contracted coronavirus, which has made
21			finalizing the brief exceptionally difficult.
22		9.	Counsel for Commonwealth does not oppose the requested extension to the extent
23			that a response is permitted;
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27	///		
28	///		

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	I and the second				
1	10. This is the fifth request for an extension which is made in good faith and not fo				
2	purposes of delay.				
3	IT IS SO STIPULATED.				
4	DATED this 1 st day of March, 2021.	DATED this 1 st day of March, 2021.			
5	WRIGHT, FINLAY & ZAK, LLP	SINCLAIR BRAUN LLP			
6 7 8	/s/ Lindsay D. Robbins Lindsay D. Robbins, Esq. Nevada Bar No. 13474	/s/ Kevin S. Sinclair Kevin S. Sinclair, Esq. Nevada Bar No. 12277			
9	7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117	16501 Venture Blvd., Suite 400 Encino, CA 91436			
10	Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust Company of California, N.A.,	Attorneys for Defendants, Commonwealth Land Title Insurance Company, Fidelity National Title Group, Inc., and Fidelity			
11 12	as Trustee for American Home Mortgage Investment Trust 2005-2	National Title Insurance Company			
13					
14					
15	IT IS SO ORDERED.				
16	DATED this <u>1st</u> day of <u>March</u>	, 2021.			
17		0			
18	UN	ITED STATES DISTRICT COURT JUDGE			
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